

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

**LATOYA BROWN; LAWRENCE BLACKMON
HERBERT ANTHONY GREEN; KHADAFY MANNING;
QUINETTA MANNING; MARVIN MCFIELD; NICHOLAS
SINGLETON; STEVEN SMITH; BESSIE THOMAS; and
BETTY JEAN WILLIAMS TUCKER, individually and on
behalf of a class of all other similarly situated,**

PLAINTIFFS

v.

CIVIL ACTION NO. 3:17-cv-347 WHB LRA

**MADISON COUNTY, MISSISSIPPI; SHERIFF
RANDALL S. TUCKER, in his official capacity; and
MADISON COUNTY SHERIFF'S DEPUTIES JOHN
DOES #1 through #6, in their individual capacities,**

DEFENDANTS

NOTICE OF DEPOSITION WITH DOCUMENT PRODUCTION

PLEASE TAKE NOTICE that Defendants Madison County, Mississippi and Sheriff Randall C. Tucker, by and through counsel, shall depose the following person, on the date, at the location, and time designated below, upon oral examination by stenographic means, under oath before a duly authorized court reporter or other officer authorized by law to administer oaths under law.

NAME: RAHUL GUHA, PH.D

DATE: Wednesday, April 18, 2018

TIME: 9:00 A.M.

PLACE: Law Offices of Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017
Tel. #: 212-455-3869

The oral examination shall continue from day to day until completed. You are notified to appear and take part in the examination as you deem proper.

Plaintiffs are further commanded to have the deponent have with him at such time any and all items listed in Exhibit "A" attached hereto.

This the 27th day of March, 2018.

s/ Charles E. Ross

Michael B. Wallace (MSB #6904)
Charles E. Ross (MSB #5683)
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**ATTORNEYS FOR DEFENDANTS MADISON
COUNTY, MISSISSIPPI and SHERIFF RANDALL C.
TUCKER, in his official capacity.**

CERTIFICATE OF SERVICE

I, Charles E. Ross, hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

Joshua Tom (MSB #105392)
Paloma Wu (*pro hac vice* forthcoming)
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This the 27th day of March, 2018.

s/ Charles E. Ross
Charles E. Ross

EXHIBIT "A"

Deponent RAHUL GUHA, PH.D., is requested to bring the following documents with him to his deposition to be taken on Wednesday, April 18, 2018, at 9:00 a.m.

1. Your entire file in this matter to include all materials supplied to you by counsel for Plaintiff and any computations, draft reports, notes or other documents prepared by you with regard to this case, your opinions, or your testimony.
2. Any and all billing and time records.